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8 UNITED STATES DISTRICT COURT  
9 DISTRICT OF NEVADA

10 \* \* \*

11 UNITED STATES OF AMERICA,  
12 Plaintiff,  
13 vs.  
14 RICHARD LEE COOK,  
15 Defendant.  
16

2:15-cr-100-JAD-GWF-1

**MOTION TO RE-OPEN BAIL**

(Expedited Treatment Requested)

17 On April 7, 2015, Richard Cook (Cook), was indicted with being a Felon in Possession of  
18 a Firearm, in violation of 18 U.S.C. § 922(g)(1). On April 10, 2015, Cook made an initial  
19 appearance and ordered Cook detained. The detention order states this Court found by a  
20 preponderance of the evidence that Cook is a flight risk based on: (1) the weight of the evidence  
21 against Cook; (2) Cook's prior Felony and Misdemeanor convictions; and (3) Cooks' use of aliases  
22 and outstanding warrants.

23 This Court considered specifically mentioned at the close of the hearing that the Court would  
24 consider the release of Mr. Cook if there was a placements available at the half way house. In  
25 addition, this Court made mention of the possibility of having a third party custodian.

26 Undersigned has spoken to a friend of Mr. Cook's Penny Lee Hodgins, who is willing to  
27 serve as a third party custodian. She has resided in Las Vegas since 1994 and currently resides at  
28 4683 Kristy Louise Way #A, Las Vegas, NV 89121.

Undersigned has spoken to Pre-trial Services Officer Sandra Bustos, who advises that at this time there are no placements at the half-way house. Pre-trial Services indicated they have a waiting list right now with four individuals on it. Undersigned asks that a hearing be held to determine whether this Court will entertain releasing Cook to a third party custodian or to the half-way house and place him on the waiting list should the Court authorize the latter.

DATED this 12<sup>th</sup> day of May, 2015.

Respectfully submitted,

RENE L. VALLADARES  
Federal Public Defender

/s/ Brenda R. Weksler

By: BRENDA R. WEKSLER,  
Assistant Federal Public Defender

**CERTIFICATE OF ELECTRONIC SERVICE**

The undersigned hereby certifies that I am an employee of the Federal Public Defender for the District of Nevada and am a person of such age and discretion as to be competent to serve papers.

That on May 12, 2015, I served an electronic copy of the above and foregoing **MOTION TO RE-OPEN BAIL** (Expedited Treatment Requested) by electronic service (ECF) to the persons named below:

DANIEL G. BOGDEN  
United States Attorney  
ROBERT KNIEF  
Assistant United States Attorney  
333 Las Vegas Blvd. So., 5<sup>th</sup> Floor  
Las Vegas, Nevada 89101

*/s/ Maribel Bran*

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Employee of the Federal Public Defender